

**REMARKS****Restriction Requirement:**

Applicants affirm the telephone election on May 31, 2005 of Group I claims 1-7 and 16-20. Group II claims 8-15 have been canceled.

**In the Claims:**

Claims 1-7 and 16-27 remain in this application. Claims 8-15 have been canceled. New claims 21-27 have been added.

**Rejections Under 35 U.S.C. 102(b):**

Claims 1-4, 7, and 16-19 were rejected under 35 U.S.C. 102(b) as being anticipated by Enroth et al. (U.S. 6,462,285) (hereinafter "Enroth").

Because Enroth fails to disclose applying thermally conductive material to the first side of the structural layer as recited in claims 1 and 16, the rejection is unsupported in the art and should be withdrawn. As recited in claims 1 and 16, the connection pad and conductive trace are on the first side of the structural layer. The thermally conductive material is also applied to the first side. Thus, in claims 1 and 16 the thermally conductive material is applied to the side on which the connection pad and conductive trace are located.

In Enroth, in contrast, the plug 70 is applied to the side opposite to the side on which the connection pad 32 and trace 38 are located. The connection pad 32 and trace 38 of Enroth are on the top surface 12 (Enroth, col. 4, lines 23-28; Figure 8) while the plug 70 is applied to the bottom surface 14 (Enroth, col. 5, lines 5-22; Figures 6-8). Because Enroth fails to disclose applying thermally conductive material to the same side of the structural

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layer as that on which the connection pad and conductive trace are located, Applicants request withdrawal of the rejection.

Claims 2-4 and 7 depend from claim 1 and claims 17-19 depend from claim 16. The rejections of claims 2-4, 7 and 17-19 are thus also unsupported in the art for the reasons provided above.

Rejections Under 35 U.S.C. 103(a):

Claims 5, 6, and 20 were rejected under 35 U.S.C. 103(a) as being unpatentable over Enroth in view of Akram et al. (U.S. 6,815,817) (hereinafter "Akram").

As discussed above, Enroth fails to disclose the limitations of claims 1 and 16. Akram fails to rectify this deficiency.

Applicants also point out that, in contrast to the Examiner's contention on page 4 of the Office Action, Akram fails to disclose a thermal epoxy at col. 4, lines 25-35. Akram merely discloses an epoxy that may have inert filler material and may have a coefficient of thermal expansion. This does not constitute a disclosure of thermal epoxy.

Respectfully submitted,

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(37 C.F.R. § 1.8(a))

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